

Polek, Jim

From: Weaver, Stefanie <stefanie.weaver@doh.hawaii.gov>
Sent: Wednesday, July 31, 2013 6:47 PM
To: Polek, Jim
Cc: Michael.Tsuji@doh.hawaii.gov
Subject: FW: The City's Water Quality Compliance Determination methodology

Hi Jim,

The City and County of Honolulu sent this to us today. Could you take a look at their request for comments and let us know what you think?

Thanks

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Environmental Engineer
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Stefanie

From: Lum, Jared [<mailto:jlum1@honolulu.gov>]
Sent: Wednesday, July 31, 2013 3:27 PM
To: Tsuji, Michael; Weaver, Stefanie
Cc: Toyota, Lesley; Zhou, Zhijun; Jaramilla, Cleveland
Subject: The City's Water Quality Compliance Determination methodology

Hello, Mike and Stefanie,

As requested, this is a summary of the requests I had made to Mike at about 2:30 pm today. I had been asked to speak to Mike about these issues by our Director.

In light of the current permit reapplications, we are re-examining the methods we use for determining water quality compliance.

We had first presented our methodology in 1996 in the 1995 Annual Assessment Reports. The methodology was based on concepts in the 208 document, Report of the Technical Committee on Water Quality Standards, Technical Report 1, December 1, 1977.

Among the concepts stated in the 208 document which we had incorporated in our methodology were:

- (1) the standards being based on a log-normal distribution rather than a normal distribution of the data;
- (2) the use of "not to exceed levels" based on geometric mean, 90%, and 98% of the time
- (3) the recommendation that the compliance testing program be based on at least 30 samples, or 10 samples at three depths.
- (4) the recommendation for sampling coastal waters at the 1 meter, 10 meter and 30 meter depths.

We request an indication from you of whether the City should continue to use our existing methodology.

The second request I had made involves the Sand Island WWTP offshore stations. For our compliance methodology, we perform the analyses on the ZOM stations and then on "ambient" stations. For the ambient stations, we have been using the farthest offshore stations from the ZOM. This means that two offshore stations closer to the ZOM are not being used in the analyses. [Note that we do submit the raw data of the two stations to DOH and EPA.] Does DOH find this procedure acceptable?

Thanks.

---Jared